

Date: May 28, 1991

To: Home Health Agencies

HHA 9

From: Larry Tainter, Director  
Bureau of Quality Assurance  
Kevin Piper, Director  
Bureau of Health Care Financing

Subject: Follow-up Questions to BQC Memo 91-002 (January 17, 1991)

The Bureau of Quality Compliance and the Bureau of Health Care Financing have received several questions relative to BQC memo 91-002 which dealt with medication administration by unlicensed caregivers. With this memo, we will provide responses to the most frequently asked questions.

1. How do you define the term “competent adult” relative to medication administration?

Competent adults, who are 18 years or older, should be able to identify their medications, their intended effect, their dosage (1 tablet, 2 tablets), the time and route of administration, significant side effects, and any special instructions (take with food, etc.). Competency determination in this context should be determined upon initial assessment, including mental status evaluation and task analysis, as an ongoing process during supervisory visits, and as often as necessary. If the patient exhibits intermittent forgetfulness, he or she would not meet the definition of “competent” in this context.

2. Do “PRN” medications have to be preselected by the nurse, pharmacist or family/informal caregiver, in order for the unlicensed caregivers to assist with the self-administration of the medications to competent adults?

When the competent adult determines a need for “PRN” medication, s/he may direct the unlicensed caregiver to retrieve the medication. The selection of the medication and the dose and route will be determined by the competent adult, thus meeting the definition of assistance.

In addition, the Bureau of Health Care Financing will require documentation relative to the competence of the adult receiving assistance with medication and the training provided to the unlicensed caregiver, along with the name of the delegating registered nurse on the prior authorization request form for Wisconsin Medical Assistant Program (WMAP) recipients.

3. What were the results of the medication administration survey attached to BQC Memo 91-002?

The attached addendum includes survey results along with comments submitted by industry representatives.

Based upon survey results, it is very clear that the home health industry rejects medication administration by unlicensed caregivers but overwhelmingly supports the ability of the

unlicensed caregiver to assist with the self-administration of prescribed drugs or over-the-counter drugs, which have been preselected and/or labeled by the competent adult patient, informal caregiver, the nurse or the pharmacist.

We thank you for your participation in this survey. The Bureau of Quality Compliance will take this information into consideration when drafting revisions to HSS 133.

If you have additional questions, please contact Mary Krill at (608) 266-9433.

LT:KP:bc 7990

Attachment

cc:     -BQC Staff  
          -Office of Legal Counsel  
          -George F. MacKenzie, DOH Admin.  
          -Kevin Piper, BHCF Dir.  
          -HCFA, Region V  
          -Illinois State Agency  
          -Ohio State Agency  
          -Michigan State Agency  
          -Indiana State Agency  
          -Minnesota State Agency  
          -WI Coalition for Advocacy  
          -Service Employees International Union  
          -WI Counties Assn.  
          -WI Medical Records Assn. Cons. Committee  
          -WI Assoc. of Homes and Services for Aging  
          -Comm. on Aging, Ext. Care Fac./HH (SMS)  
          -WI Assn. Nursing Homes  
          -WI Homecare Organization  
          -Bur. Long Term Support, DCS